

**BOBBY J. GOLDEN**

**PLAINTIFF**

**VERSUS**

**CASE NO.: 1:06cv1006LG-JMR**

**HARRISON COUNTY, MISSISSIPPI;  
SHERIFF GEORGE PAYNE, OFFICIALLY AND  
IN HIS INDIVIDUAL CAPACITY;  
LEE OTIS JACKSON, OFFICIALLY AND IN HIS  
INDIVIDUAL CAPACITY;  
MAJOR DIANNE GASTON-RILEY, OFFICIALLY  
AND IN HER INDIVIDUAL CAPACITY;  
CAPTAIN RICK GASTON, BOOKING SUPERVISOR,  
OFFICIALLY AND IN HIS INDIVIDUAL CAPACITY;  
CAPTAIN PHILLIP TAYLOR, OFFICIALLY AND IN HIS  
INDIVIDUAL CAPACITY;  
JOHN DOES 1-5, OFFICIALLY AND IN THEIR  
INDIVIDUAL CAPACITY**

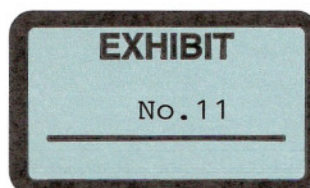
**DEFENDANTS**

**STATE OF MISSISSIPPI  
COUNTY OF HARRISON**

**AFFIDAVIT OF BOBBY J. GOLDEN**

**PERSONALLY CAME AND APPEARED BEFORE ME**, the undersigned authority in  
and for the County and State aforesaid, the within named Bobby J. Golden, who after first being  
duly sworn by me on his OATH, did depose and state the following:

1. My name is Bobby Joe Golden and I have personal knowledge of the matters and facts contained in this Affidavit and I am competent to testify to the matters stated herein.
2. That I was arrested for Domestic Violence (simple assault) in the early morning on February 26, 2005. I was involved in an altercation with a female, who I had an intimate relationship with and her male companion, who was present in her home, whom I broke into. As a result of the altercation between a former girlfriend and her paramour, my injuries were



officers responded to the residence of Nida Michelle Cnales, my former girlfriend and arrested me and transported me to the Harrison County Adult Detention without any incident.

3. When I arrived at the Harrison County Adult Detention Center, I was placed in the booking room and I was irritated because of the arrest, but never resisted nor caused a disturbance that warrant being punched in the eye and sprayed with OC. Later in the morning on February 27, 2005, I was sleeping on the dayroom floor in B-block, F Section and was awakened by inmates assaulting me. I was advised by other inmates that extra food trays were given to the juvenile detainees by Deputy Lee Otis Jackson to assault me.

4. On February 27, 2005, Defendant Lee Otis Jackson escorted me to the recreation yard and questioned me about assaulting, a female named Nida Cnales, a former girlfriend of Defendant Jackson and mother of Defendant Jackson three (3) children. After Jackson questioned me about assaulting his former girlfriend, he placed gloves on his hands and began beating me by punching and kicking my body, aggravating the injuries sustained to my ribs caused by juvenile detainees. Defendant Jackson escorted me back inside of the Harrison County Detention Facility and placed me in an isolation cell.


5. I at no time I resisted the officers who arrested me, nor did I defend myself when the juvenile detainees and Defendant Jackson brutally beat me. Because of the number of inmate assaults that have occurred at the Harrison County Adult Detention Center from the year 2001-2006, it is my opinion that officials employed at the HCADC were deliberately indifferent to detainees' rights, which an inference could have been drawn and their omission tantamount to a conspiracy to cover-up the assault on inmates. My opinion was based upon the utterance of

supported by official policy of the jail.

I certify the above declaration is true and correct to the best of my recollection.

  
BOBBY J. GOLDEN

**SWORN TO AND SUBSCRIBED BEFORE ME**, this the 1<sup>st</sup> day of August, 2008.

  
NOTARY PUBLIC

MY COMMISSION EXPIRES:

NOTARY PUBLIC STATE OF MISSISSIPPI AT LARGE  
MY COMMISSION EXPIRES: Feb 24, 2009  
BONDED THRU NOTARY PUBLIC UNDERWRITERS

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